

# EXHIBIT B

1 Nico Banks (CA SBN:344705)  
2 **BANKS LAW OFFICE**  
3 712 H St NE, Unit #8571  
4 Washington, DC 20002  
5 Tel.: 971-678-0036  
6 Email: [nico@bankslawoffice.com](mailto:nico@bankslawoffice.com)

5 Richard A. Nervig (CA SBN:226449)  
6 **RICHARD A. NERVIG, P.C.**  
7 501 West Broadway, Suite 800  
8 San Diego, CA 92101  
9 Phone: 760-451-2300  
Email: [richard@nerviglaw.com](mailto:richard@nerviglaw.com)

10 | *Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

14 DAVID HOUGH; *et al.* } Case No.: 2:24-cv-02886-WLH-SK  
15 Plaintiffs, }  
16 vs. } **STIPULATION TO STAY**  
17 RYAN CARROLL; *et al.* } **DEFENDANT WELLS FARGO'S**  
18 Defendants. } **TIME TO FILE A RESPONSIVE**  
19 } **PLEADING PENDING**  
20 } **PLAINTIFFS' FORTHCOMING**  
21 } **SECOND AMENDED COMPLAINT**  
22 } Presiding Judge: Hon. Wesley L. Hsu  
23 } Trial Date: N/A  
24 }

**STIPULATION TO STAY DEFENDANT WELLS FARGO'S TIME TO FILE  
A RESPONSIVE PLEADING PENDING PLAINTIFFS' FORTHCOMING  
SECOND AMENDED COMPLAINT**

This Stipulation is entered into by and between Plaintiffs and Defendant Wells Fargo, through their respective counsel of record.

1  
2 WHEREAS, Plaintiffs have received third-party documents and intend to  
3 amend the currently operative First Amended Complaint to add new defendants and  
4 new allegations about existing defendants;

5  
6 WHEREAS, Plaintiffs require additional time to investigate entities and  
7 individuals to potentially be added as defendants, and to further investigate  
8 forthcoming new allegations about existing defendants;

9  
10 WHEREAS, if Plaintiffs are unable to reach agreements on subpoenas they  
11 issued, Plaintiffs anticipate filing motions to compel discovery from Wells Fargo as  
12 well as third-party banks including Thread Bank, ~~Wells Fargo~~, Bank of America, and  
13 JP Morgan—including compelling discovery of account statements, wire transfers,  
14 and third-party-agent/payment-processor transaction data—no later than July 26,  
15 2024;

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17 WHEREAS, Plaintiffs anticipate that the discovery resulting from those  
18 motions to compel, if any, will significantly further inform Plaintiffs' allegations;

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20 WHEREAS, it would be most efficient—and in the interests of justice—for  
21 Plaintiffs to wait to file an amended complaint until Plaintiffs have reviewed the  
22 forthcoming discovery that they anticipate receiving shortly;

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24 WHEREAS, it would also be inefficient for Wells Fargo to file a pleading  
25 responsive to the currently operative complaint when the parties anticipate that  
26 another amended complaint will be filed;

27  
28 | STIPULATION TO EXTEND WELLS FARGO'S TIME TO FILE AN ANSWER A RESPONSIVE PLEADING

1 IT IS HEREBY STIPULATED AND AGREED by the parties as follows:

2 The deadline for Wells Fargo to file a responsive pleading to the current  
3 complaint should be stayed.

4 Plaintiffs should be ordered to file an amended complaint no later than October  
5 31, 2024.

6 Wells Fargo should be ordered to file a responsive pleading no later than 30  
7 days from the date Plaintiffs file their amended complaint.

8 This stipulation is made without prejudice to any party's right to seek further  
9 extensions or modifications by agreement or by order of the Court for good cause.

10 IT IS SO STIPULATED.

11 Dated: August 14, 2024

12  
13 /S/ Nico Banks  
14 Nico Banks (CA SBN:344705)  
15 **BANKS LAW OFFICE**  
16 712 H St NE, Unit #8571  
17 Washington, DC 20002  
18 Tel.: 971-678-0036  
19 Email: [nico@bankslawoffice.com](mailto:nico@bankslawoffice.com)

20 Richard A. Nervig (CA SBN:226449)  
21 **RICHARD A. NERVIG, P.C.**  
22 501 West Broadway, Suite 800  
23 San Diego, CA 92101  
24 Phone: 760-451-2300  
Email: [richard@nerviglaw.com](mailto:richard@nerviglaw.com)

25 *Attorneys for Plaintiffs*

26  
27  
28 /s/ Michael S. Lowe

1                   **MICHAEL S. LOWE**  
2                   Troutman Pepper Hamilton Sanders  
3                   2 Logan Square  
4                   18th and Arch Streets  
5                   Philadelphia, PA 19103  
6                   Phone: 215-981-4364  
7                   Fax: 215-981-4750

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8                   Email: michael.lowe@troutman.com

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9                   *Attorney for Wells Fargo Bank, N.A.*  
10                  ~~HINSERT WELLS FARGO~~  
11                  ~~SIGNATURE~~

## **WORD COUNT COMPLIANCE CERTIFICATION**

The undersigned, counsel of record for Plaintiffs, certifies that this brief contains fewer than 7,000 words, which complies with the word limit of L.R. 11-6.1

/s/Nico Banks  
Nico Banks  
Dated: August 14, 2024

## ATTESTATION

Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Nico Banks  
Nico Banks

## **CERTIFICATE OF SERVICE**

On August 14, 2024, I served this motion and accompanying papers via first-class mail to the parties listed below with addresses below their names, and via email to the parties with email addresses below their names:

JARED DAY;  
19710 Chara Ct,  
Cypress, TX 77433

CHRISTINE CARROLL;  
11298 Snow View Ct,  
Yucaipa, CA 92399

TRAVIS MARKER; THE LAW OFFICE OF TRAVIS R. MARKER, A PROFESSIONAL CORPORATION (D.B.A. "MARKER LAW AND MEDIATION"); & PARLAY LAW GROUP A PROFESSIONAL CORPORATION  
333 2nd St.  
Suite 16,

1 Ogden, UT, 84404

2 MATTHEW CROUCH;  
3 Via email to his attorney Levi Y. Silver at lsilver@swsslaw.com

4 REYHAN PASINLI & TOTAL-APPS, INC.  
5 Via email to their attorney Geoffrey Brethen at gbrethen@wattslawyers.com

6 TROY MARCHAND & QUANTUM ECOMMERCE  
7 Via email to their attorney Marc Reich at mgr@reichradcliffe.com

8 BONNIE NICHOLS & WHOLESALE UNIVERSE;  
9 Via email to their attorney Brad Geyer at bradford.geyer@formerfedsgroup.com  
10 I declare under penalty of perjury under the laws of the State of California that the foregoing statements in this Certificate of Service are true and correct.

11 /s/Nico Banks  
12 Nico Banks  
13 Dated: August 14, 2024

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